

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:

SALAHUDIN SHAHRIAR
SHAGORIKA SHAHRIAR

Debtors

Case No. 1:21-bk-00790-HWV

Chapter 13

WESTLAKE SERVICES, LLC d/b/a
WESTLAKE FINANCIAL SERVICES,

Movant

v.

SALAHUDIN SHAHRIAR,
SHAGORIKA SHAHRIAR and
JACK N. ZAHAROPOULOS, Trustee
Respondents

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

The Answer of Salahudin Shahriar and Shagorika Shahriar (“Debtors”) to the Motion of Westlake Services, LLC d/b/a Westlake Financial Services (“Movant”) for Relief from the Automatic Stay (the “Motion”), is as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. After reasonable investigation, the Debtors are without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 6 of the Motion, and proof thereof is requested at the hearing on this matter.
7. Admitted in part and denied in part. It is denied as to the attorney’s fees claimed. It is admitted that payments have not been made as to the loan. As to the total claimed such is denied.

8. After reasonable investigation, the Debtors are without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 8 of the Motion, and proof thereof is requested at the hearing on this matter.

9. The allegations of paragraph 9 of the Motion set forth conclusions of law to which no responsive pleading is required. To the extent a responsive pleading is required, such allegations are denied.

10. The allegations of paragraph 10 of the Motion set forth conclusions of law to which no responsive pleading is required. To the extent a responsive pleading is required, such allegations are denied.

WHEREFORE, it is respectfully requested this Honorable Court deny the Motion of Westlake Services, LLC d/b/a Westlake Financial Services for Relief from the Automatic Stay and that the Debtors have such other and further relief as is just and proper.

Respectfully submitted:

CUNNINGHAM, CERNICOFF
& WARSHAWSKY, P.C.

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